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FILED
U.S. DISTRICT COURT
DISTRICT OF WYOMING
2016 MAR 4 AM 11 17
STEPHAN HARRIS, CLERK
CHEYENNE

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 16-MJ-14-F

RICHARD PERSON,

Defendant.

MOTION FOR DETENTION HEARING

The United States moves for pretrial detention of the Defendant, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves the following:

Serious risk Defendant will flee

2. Reason for Detention. The court should detain the Defendant because there are no conditions of release which will reasonably assure:

Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against the Defendant under § 3142(e). The presumption applies because:

Probable cause to believe Defendant committed the crime of child exploitation

4. Time for Detention Hearing. The United States requests the Court conduct the detention hearing:

After a continuance of three days

DATED this 4th day of March, 2016.

CHRISTOPHER A. CROFTS
United States Attorney

By:


JAMES C. ANDERSON

Assistant United States Attorney